

VICTOR JIH, SBN 186515
vjih@wsgr.com
KELLY H. YIN, SBN 328380
kyin@wsgr.com
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
1900 Avenue of the Stars, 28th Floor
Los Angeles, CA 90067
Telephone: (424) 446-6900
Facsimile: (866) 974-7329

LUIS LI, SBN 156081
luis.li@wsgr.com
WILSON SONSINI GOODRICH & ROSATI, P.C.
633 West Fifth Street, Suite 1550
Los Angeles, CA 90071
Telephone: (323) 210-2900

DYLAN GRACE SAVAGE, SBN 310452
dsavage@wsgr.com
THOMAS WAKEFIELD, SBN 330121
twakefield@wsgr.com
WILSON SONSINI GOODRICH & ROSATI, P.C.
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000

*Attorneys for Defendants
TikTok Inc. and ByteDance Inc.*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BERNADINE GRIFFITH, et. al,

Plaintiffs,

v.

TIKTOK INC., et al.,

Defendants.

Case No. 5:23-cv-00964-SB-E

**DEFENDANTS' STATEMENT OF
NON-OPPOSITION TO PLAINTIFFS'
UNOPPOSED MOTION TO MODIFY
CASE MANAGEMENT ORDER AND
CONTINUE DEADLINES**

Judge: Hon. Stanley Blumenfeld, Jr.
Date: May 10, 2024
Time: 8:30 a.m.
Place: Courtroom 6C

Action Filed: May 26, 2023
Trial Date: November 25, 2024

1 Defendants agree that the schedule should be amended, and therefore do not
2 oppose Plaintiffs' Unopposed Motion to Modify the Case Management Order. ECF
3 No. 134. Defendants object, however, to three aspects of the motion: (1) Plaintiffs'
4 slanted characterization of why good cause exists to modify the scheduling order;
5 (2) Plaintiffs' attempted end-run around the process for resolving discovery disputes
6 by raising contested issues that are not properly before the Court under the guise of
7 an unopposed motion, precluding Defendants from briefing those matters; and (3)
8 Plaintiffs' failure to follow the good-faith meet-and-confer process. Although
9 Defendants could expand on each of these objections, they do not believe the Court
10 needs to resolve these disputes when the parties agree on the fundamental relief they
11 seek from the Court. Should the Court want briefing on any of these issues,
12 Defendants are willing to supply it.

13
14 Dated: April 17, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

15
16 By: /s/ Victor Jih

17 Victor Jih

18 *Attorneys for Defendants*
19 *TikTok Inc. and ByteDance Inc.*